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21 **UNITED STATES BANKRUPTCY COURT**
22 **DISTRICT OF NEVADA**

23 In re:

24 USA COMMERCIAL MORTGAGE
25 COMPANY,

26 USA CAPITAL REALTY ADVISORS,
27 LLC,

28 USA CAPITAL DIVERSIFIED TRUST
29 DEED FUND, LLC,

30 USA CAPITAL FIRST TRUST DEED
31 FUND, LLC,

32 USA SECURITIES, LLC, Debtors.

33 Case No. BK-S-06-10725-LBR
34 Case No. BK-S-06-10726-LBR
35 Case No. BK-S-06-10727-LBR
36 Case No. BK-S-06-10728-LBR
37 Case No. BK-S-06-10729-LBR

38 **CHAPTER 11**

39 Jointly Administered Under Case No.
40 BK-S-06-10725 LBR

41 **STIPULATION AND JOINT EX
42 PARTE MOTION FOR EXTENSION
43 OF TIME TO RESPOND TO
44 MOTION TO QUASH**

45 [No hearing required]

46 **Affects:**

- 47 All Debtors
48 USA Commercial Mortgage Company
49 USA Capital Realty Advisors, LLC
50 USA Capital Diversified Trust Deed Fund, LLC
51 USA Capital First Trust Deed Fund, LLC
52 USA Securities, LLC

53 The USACM Liquidating Trust (the "Trust") hereby moves this Court for an order
54 extending the deadline to respond to the "Motion of Kreg Rowe et. al, to Quash
55 Subpoenas" that was filed on May 11, 2007.

1 On May 11, 2007, several individuals and entities moved to quash subpoenas
 2 directed to Wells Fargo Bank, N.A., Wells Fargo Bank of Nevada, Nevada State Bank, JP
 3 Morgan Chase, Bank of the West, Oppenheimer Funds, Bank of America, City Bank, Kreg
 4 Rowe, and Brett Seabert. The Trust's response to the Motion to Quash is due on
 5 May 29, 2007.

7 Counsel for the Movants on the Motion to Quash and counsel for the Trust have
 8 been actively discussing ways to resolve this matter without court intervention. Therefore,
 9 in order to allow the negotiations to continue, the parties have agreed to allow an extension
 10 of time *until June 1, 2007* for the Trust to respond to the Motion to Quash. Counsel
 11 anticipate that they will be able to reach an agreement on the matter by that date.

13 WHEREFORE, the parties jointly request an extension of time allowing the Trust
 14 until June 1, 2007 to file a response to the Motion to Quash.

16 Dated: May 29, 2007.

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